

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

[illegible]

**DEBTORS' MOTION FOR CONTINUATION OF AUTOMATIC STAY, NOTICE OF
OPPORTUNITY FOR HEARING AND NOTICE OF HEARING**

COMES NOW the Debtors, Ben L. Young & Marsha Young, by and through their attorney of record, Dekovan L. Bowler, and hereby moves this Court, pursuant to section 362(c)(3)(B), for an Order Continuing the Automatic Stay provided under section 362 as to all creditors. In support of said Motion, Debtors would state as follows:

1. Debtors filed for relief under the provisions of Chapter 13 Bankruptcy on September 16, 2015.
2. The petition in this case has been filed in good faith. The debtors believe that the submitted Chapter 13 plan will be confirmed and that they will be able to fully perform under the terms of the plan.
3. Debtors have previously filed a Chapter 13 bankruptcy, case number 15-11837.
4. Debtors' prior Chapter 13 case was dismissed on July 15, 2015 and was the only previous bankruptcy case pending during the preceding year.
5. Debtor's prior case was dismissed for debtors failure to comply with the credit counseling requirements under 11 U.S.C. section 109(h)(1). Since that time and prior to filing this case debtors have completed their credit counseling requirements and have filed those certificates with the bankruptcy court clerk.
6. Debtors' net monthly income is \$2,470.27 and debtors have approximately \$1,561.00 per month as their disposable income, an amount that is sufficient to fund their Chapter 13 plan.

NOTICE OF OPPORTUNITY FOR HEARING

Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effect of this document. If you do not want the Court to grant the requested relief, or you wish to have your views considered, you must file a written response or objection to the requested relief with the Clerk of the United States Bankruptcy Court for the Western District of Oklahoma, 215 Dean A. McGee Avenue, Oklahoma City, OK 73102 no later than 21 days from the date of filing of this request for relief. You should also serve a file stamped copy of your response or objection to the undersigned movant/movant's attorney [and others who are required to be served] and file a certificate of service with the Court. If no response or objection is timely filed, the Court may grant the requested relief without a hearing or further notice. The 21 day period includes the three (3) days allowed for mailing provided for in Bankruptcy Rule 9006 (f).

WHEREFORE PREMISES CONSIDERED Debtors pray that this Court enter an order continuing the automatic stay as to all creditors and any other relief the debtors may be entitled to according to bankruptcy law.

Respectfully Submitted,

/s/Dekovan L. Bowler
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ATTORNEY FOR THE DEBTORS

NOTICE OF HEARING

YOU ARE HEREBY NOTIFIED THAT THIS MATTER IS SET FOR HEARING ON THE 14th DAY OF OCTOBER, 2015 AT 2:00 O'CLOCK P.M. BEFORE THE HONORABLE JUDGE JANICE D. LOYD SECOND FLOOR COURTROOM OF THE UNITED STATES BANKRUPTCY COURTHOUSE FOR THE WESTERN DISTRICT OF OKLAHOMA LOCATED AT 215 DEAN A. MCGEE, OKLAHOMA CITY, OKLAHOMA 73102.

CERTIFICATE OF SERVICE

This is to certify that on the 23rd day of September, 2015, a true and correct copy of the above and foregoing Motion was mailed first class postage prepaid: Assistant United States Trustee's Office, 215 Dean A. McGee, 4th Floor, Oklahoma City, Oklahoma 73102; John T. Hardeman, Chapter 13 Trustee, P.O. Box 1948, Oklahoma City, OK 73101, and all creditors listed on the attached debtor's mailing matrix.

/s/Dekovan L. Bowler
DEKOVAN L. BOWLER